

Michigan Department of Labor & Economic Growth Bureau of Construction Codes P.O. Box 30254 Lansing, Michigan 48909 (517) 241-9302

Bureau of Construction Codes Technical Bulletin

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Manufactured Home Installation Requirements

"Providing for Michigan's Safety in the Built Environment"

Technical bulletins are issued to provide clarification on issues that arise regarding code administration and enforcement. The information provided in the bulletin is developed to promote uniform interpretation and enforcement of the state codes.

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MANUFACTURED HOME INSTALLATION REQUIREMENTS

Issue

Who may complete factory installed equipment installations in manufactured homes? When a manufactured home is placed on a privately owned site or in a manufactured home community, a question concerning the ability of licensed manufactured home installers/repairers to complete factory installed equipment installations and the necessary connection has been raised.

This technical bulletin will outline the need for permits, who may secure permits, and what regulations apply to the installation of manufactured homes. Additional clarifications on the completion of electrical installations are found in Technical Bulletin Number 25.

This technical bulletin was revised (December 2000) in response to concerns regarding the replacement of equipment within a manufactured home. Specific issues addressed are, repair and replacement of such items as water heaters, furnaces, air conditioning units, plumbing fixtures, electrical wiring and fixtures, and mechanical devices.

Permits

Whether placed on a privately owned site or within a licensed manufactured home community, permits, including building, electrical, mechanical, and plumbing, are required for the installation of the unit(s). The Stille-DeRossett-Hale Single State Construction Code Act (Act No. 230, PA 1972, as amended) provides in section 10(1), that:

"Except as otherwise provided in the code, before construction of a building or structure, the owner, or the owner's builder, architect, engineer, or agent, shall submit an application in writing to the appropriate enforcing agency for a building permit."

Section 10(6) further states:

"This section shall be construed to allow the imposition of requirements in the code, or in other laws or ordinances, for additional permits for particular kinds of work, including plumbing and electrical, or in other specified situations."

These provisions of the Act are applicable throughout the state in all installations. A permit shall be issued for the on-site work to build the foundation system and completion of all required connections with the utility services.

The Plan Review Division maintains responsibility for the approval of manufactured home community construction under the Mobile Home Commission Act¹. This Act provides for the approval of initial construction and renovations of manufactured home communities, including site preparation, foundation systems, and other improvements (i.e., streets, walkways, etc.).

Structures built within communities (i.e., community buildings, pools, and other permanent structures) are required to meet the provisions of the State Construction Code Act. Add-ons (other than factory built) are required to meet the construction standards under the State Construction Code Act.

Garages and other additions constructed on-site are also required to comply with the applicable codes adopted pursuant to the State Construction Code Act.

The Federal Manufactured Home Construction and Safety Standards Act² provides that a local inspection authority may conduct those non-destructive tests and inspections necessary to determine damage in transit and proper installation.

Permits for the repair or replacement of equipment, devices, and fixtures within manufactured homes are required under the provisions of the respective codes and pursuant to Section 10 of the State Construction Code Act.

Licensing Criteria

Manufactured homes produced under the Federal Manufactured Home Construction and Safety Standards Act, may be installed by persons licensed as a manufactured home installer/repairer under the provisions of § 25 (c) of Act No. 96, PA 1987, including completion of all factory installed connections from the unit to the necessary utilities. Technical Bulletin Number 25 clarifies the installation of electrical connections. Manufactured home licensees may only complete factory electrical connections to utilities where the connection involves a simple cord connection and does not exceed a 50-ampere rating.

A manufactured home installer/repairer may not secure a permit under the language contained in sections 10(1) and (6) of the State Construction Code Act. The electrical, mechanical, and plumbing code rules adopted under this Act require that a person must be authorized to secure a permit in the appropriate trade as follows:

- ◆ Plumbing permits a plumbing contractor, licensed under the Michigan Plumbing Law {Act No. 733, PA 2002};
- ◆ Electrical permits an electrical contractor licensed under the Electrical Administrative Act (Act No. 217, PA 1956); and
- ♦ Mechanical Permits a contractor licensed under the authority of the Forbes Mechanical Contractors Act (Act No. 192, PA 1984).

A homeowner may secure a permit, when he or she assumes responsibility and does the work on their home on a single site.

¹Act No. 96, PA 1987 ²42 U.S.C. 5401 et seq. Section 25(3) of Act No. 96, PA 1987 states in part:

"The electrical administrative act...Act No. 266 of the Public Acts of 1929 (Michigan Plumbing Law)*...and the Forbes mechanical contractors act...shall not apply to the setup or installation of a mobile home and the following connections or replacement or repair of the following connections, by a licensed mobile home installer and repairer:

- (a) factory-installed electrical wiring, devices, appliances, or appurtenances to available electrical meters or pedestals.
- (b) factory-installed piping, fixtures, plumbing appliances and plumbing appurtenances to sanitary drainage facilities, venting systems or public or private water supply systems.
- (c) factory-installed process piping, heating and cooling equipment and systems or supply lines to available service meters or mains."

* PA 266 of 1929 repealed 3/31/2003 by Act 733, PA 2002

For replacement and repair of equipment, devices, and fixtures, the three respective licensing laws require: (1) an authorized person to secure the required permit and perform the work or (2) a homeowner to secure the permit and perform the work.

Section 25(3) of Act 96, PA 1987 provides that a licensed manufactured housing dealer/retailer, or installer/repairer may secure permits and perform work on homes located in manufactured housing communities. However, Technical Bulletin #25 limits the electrical work to homes not exceeding a 50-ampere rating utilizing a cord/cap connection.

Discussion

Each of the respective laws governing the installation of regulated equipment and systems provides differing conditions applying to the setup of or installation of manufactured homes. This technical bulletin is written to clarify the application of the standards administered by the Bureau of Construction Codes.

For purposes of discussion on this topic, it is presumed that certain connections must be made from the factory installed equipment (piping and electrical lines to the necessary utility connections on-site) to make the home functional and available for occupancy. Typically, factory connections end at a point on or near the exterior shell of the unit and are connected to the appropriate source at the place of final installation.

Each licensing program regulating the activities of a specific trade or occupation provides information on minimum qualifications. Additionally, the codes adopted for use in the State of Michigan set forth minimum criteria for the practice or trade. In manufactured homes, the law regulating the practices involved in the placement of these homes differs in certain applications. The following clarification sets forth the requirements for the placement of homes on single sites and within manufactured home communities.

While the respective licensing laws appear to restrict repairs and replacement of devices, equipment, and appurtenances to those licensed in a particular profession, Section 25(3)

of Act 96, PA 1987 allows manufactured housing dealers and installer/repairers to perform work with various restrictions.

Clarification

Building

Single Site Installations (Private): A licensed manufactured home installer/repairer may install a home on a private site, and may also secure a permit to place the unit(s) and complete the factory connections (i.e., siding, roofing, leveling and skirting).

All work performed on-site to install the foundation system on sites other than manufactured home communities licensed by the Building Division, must be completed by a person licensed as a residential builder, as provided by the Michigan Occupational Code (Act No. 299, PA 1980, as amended), or a homeowner who secures the permit and does the work completing the installation of the foundation system. Permits must be secured from the enforcing agency having responsibility for code administration and enforcement within the jurisdiction in which the home is located.

Manufactured Home Community Installations: In manufactured home communities, under the jurisdiction of the Building Division, foundation systems are installed at the time of the construction of the community. Alterations to foundation systems must receive approval from the Plan Review Division. A licensed installer/repairer may do modifications of the foundation system.

Homeowners may secure a permit to complete the work for the installation of a unit.

Electrical

Single Site Installations (Private): Installations on private sites consist of the connection of a tie-in from the main breaker panel to the meter base and the mating of the wiring between multi-sectional units. This work is required to be performed by a licensed electrical contractor under an electrical permit.

Manufactured Home Community Installations: These installations typically consist of the connection of a tie-in from the main breaker panel to the meter base and the mating of wiring between multi-sectional units. A licensed electrician must perform this work. Technical Bulletin Number 25 concludes a home not exceeding a 50-ampere rating, using a factory installed cord/cap connection to a receptacle, may be installed by a licensed manufactured home dealer/retailer or installer/repairer. The party performing the work must secure permits for these installations.

When modifications of the electrical system supplying energy to the pedestal or meter base or within the pedestal or meter base are required, a licensed electrician is required to perform this work under an electrical permit.

Homeowners may secure a permit to complete the work for the installation of a unit.

Mechanical

Single Site Installations (Private): The furnace or gas-fired appliance requires the connection of the gas line from the appliance to the gas meter. A licensed mechanical contractor must perform this work.

A homeowner may secure a permit and complete the installation, provided the homeowner completes the work.

Manufactured Home Community Installations: The furnace or gas-fired appliance requires the connection of the supply line from the gas meter to the appliance. This work may be performed, under a permit secured by a licensed mechanical contractor or a licensed manufactured home installer/repairer. Where modifications of the gas meter or supply line are required, a licensed mechanical contractor is required to perform the necessary modifications. Inspections will be conducted to assure compliance with the applicable code provisions.

A homeowner may secure the permit and complete the installation, provided the homeowner completes the work.

Plumbing

Single Site Installations (Private): A licensed plumbing contractor is required to secure the permit and licensed plumbers shall complete the installation of the waste/drain and supply lines between the factory installed connections and the public sewer or private sewage disposal system.

Manufactured Home Community Installation: A licensed plumbing contracting firm or a manufactured home installer/repairer may complete the factory-installed connections of plumbing equipment. A permit must be secured by the party performing the work. Inspections will be conducted to determine compliance with the applicable code provisions.

Work performed beyond the scope of the completion of the factory-installed equipment connections are required to be performed by a licensed plumber according to the Michigan Plumbing Law.

A homeowner may secure the permit and complete the installation, provided the homeowner completes the work.

Repairs and Replacement of factory installed equipment

The repair and/or replacement of factory installed electrical wiring, piping, devices, fixtures, appliances, appurtenances, and heating and cooling equipment may be performed by a licensed installer/repairer or dealer/retailer when the work is performed on a home located in a manufactured housing community. **However, dealers and retailers are limited to homes for which they are the selling agent.**

Work beyond the scope of replacement or repair of factory installed devices, must be performed by a person licensed under the respective law governing the practice of the particular trade involved.

By way of example, the installation of an air conditioning unit must be performed by a licensed mechanical contractor whether the installation occurs in a manufactured housing community or on a private site. As a further example, the installation of a ceiling fan, after the installation of the home, would be subject to permits and the installation must be performed by a homeowner or a licensed electrical contractor.

Questions regarding this technical bulletin may be directed to the Michigan Department of Labor & Economic Growth, Bureau of Construction Codes, P.O. Box 30254, Lansing, MI 48909 or by calling 517-241-9330 [Plumbing Division]; 517-241-9325 [Mechanical Division]; or 517-241-9320 [Electrical Division].

Revision #1 (April 1998) – Terminology Change: mobile homes changed to manufactured homes. Revision #2 (January 1999) – The term "dealers/retailers" deleted as the Manufactured Housing Commission General Rules effective May 15, 1998, require a person to be licensed as an installer/repairer to install manufactured homes.

Revision #3 (February 2000) – Clarification of when a homeowner can secure a permit and complete work. Revision #4 (December 2000) – Clarification of when repairs/replacement of factory-installed equipment may be completed by a licensed manufactured housing dealer/retailer or installer/repairer. Revision #5 (June 2003) – Address the repeal of Act No. 266, PA 1929 replaced with Act No. 733, PA 2002.